

## **REMARKS**

Claims 1, 20, 23, 26, 27 and 39 have been amended. Support for the amended claims is found at least at pages 19-20 of the present application. Claims 1-18, 20-37 and 39-40 are currently pending.

Applicants wish to thank Examiner Cao for the interview. Following up on the interview, Applicants have amended the claims. Applicants believe that the claims are in condition for allowance.

### **Rejection of the claims based on the Sheard reference**

1. Claims 1-10, 14, 18, 21-31, 35 and 37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,208,345 B1 to Sheard et al.

The Sheard reference teaches a visual data integration system architecture. The Office Action states that the Sheard reference teaches a network integration layer at col. 17, lines 25-44 and at the disclosure for business extension module #3, #4, and #7. As stated in the Office Action, the Sheard reference does not explicitly teach a network integration layer which provides for foreign protocol integration for converting a node and a protocol translation service for converting a protocol. The Office Action states that the Sheard reference inherently teaches the foreign protocol integration to convert a node in Fig. 1, adapter 34b, Application #2, and col. 8, lines 25-43. The Office Action further states that the Sheard reference inherently teaches protocol translation at col. 17, line 66 – col. 18, line 17. The Office Action then concludes that it would have been obvious to improve the system of the Sheard reference to provide an adapter to convert the protocols between applications.

Applicants have amended independent claims 1, 23, 26, and 27 to recite a “network integration layer [which] provides both an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol”. As an initial

matter, Applicants respectfully disagree that the Sheard reference teaches, implicitly or explicitly, to convert a node to support a dominant network protocol not native to the node. For example, the adapter 34b with Application #2 cited by the Office Action as support for converting a node does not teach how to convert a node generally and does not teach specifically how to convert a node to support a dominant network protocol not native to the node. Rather, adapter 34b “reformulates the informational content ‘A’ having a common representation to a format ‘B’ representation which is compatible with Application #2.” Col. 8, lines 29-32. This reformulation of the information content ‘A’ does not teach or suggest the node protocol conversion as claimed.

Moreover, the Sheard references fails to teach or even suggest a system or method which includes both the option of converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol. At best, the Sheard reference teaches the option of protocol translation. Applicants believe that it would be non-obvious to include both options in the network integration layer. If one of the options were included, the other option would be unnecessary. For example, if a protocol translation service were included, a node conversion protocol would not be necessary or even contemplated since the protocol conversion could account for different node types, thereby removing the need to convert the node. Thus, applicants believe that the combination of both options in the network integration layer as claimed is not obvious over the cited art. For at least the reasons discussed with regard to amended claims 1, 23, 26, and 27, Applicants respectfully request that the rejection to claims 1-10, 14, 18, 21-31, 35 and 37 be withdrawn.

2. Claims 11-12 and 32-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,208,345 B1 to Sheard et al. in view of U.S. Application No. 2002/0035577 A1 to Bordersen et al. Amendments to the claims overcome this rejection.

Bordersen et al. merely disclose a method and system for collecting, storing and retrieving data in a database management system. The method and system maintain a

partially replicated database in such a way that updates made to a central database, or to another partially replicated database are selectively propagated to the partially replicated database. Updates are propagated to the partially replicated database if the owner of the partially replicated database is deemed to have visibility as determined by rules stored in a ruled database.

Claims 11-12 depend from amended claim 1 and claims 32-33 depend from amended claim 27. Neither Sheard et al. nor Bordersen et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein a “network integration layer [which] provides both an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol”. Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 11-12 and 32-33 be withdrawn.

3. Claims 13 and 34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of Bordersen et al. and further in view of U.S. Patent No. 5,596,744 to Dao et al. Amendments to the claims overcome this rejection.

Dao et al. disclose an architecture and system which are flexible for integrated access to heterogeneous database management systems dispersed over a long haul network to allow access to a wide variety of database systems while maintaining an autonomous underlying database system.

Claim 13 depends from amended claim 1 and claim 34 depends from amended claim 27. Neither Sheard et al., Bordersen et al., nor Dao et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein a “network integration layer [which] provides both an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol”. Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 13 and 34 be withdrawn.

4. Claims 15-17 and 36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of U.S. Patent No. 6,041,362 to Mears et al. Amendments to the claims overcome this rejection.

Mears et al. merely discloses a method and system that provides a web client interface that connects through an enterprise network to an application integrating server such as a Hyper-Text Transfer Protocol (HTTP) server.

Claims 15-17 depend from amended claim 1 and claim 36 depends from amended claim 27. Neither Sheard et al. nor Mears, alone or in combination, disclose or suggest, the recited feature of an integration framework wherein a "network integration layer [which] provides both an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol". Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 15-17 and 36 be withdrawn.

5. Claims 20 and 39-40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of U.S. Patent No. 6,418,324 B1 to Doviak et al. Amendments to the claims overcome this rejection.

Doviak et al. disclose an apparatus and method for the transparent communication of data between a remote device and a fixed communication host network. The Office Action states that the Doviak reference teaches converting data from one type of protocol to another type of protocol at col. 9, lines 4-44 and teaches networking layer and data-link layer at col. 38, lines 49-64.

Claim 20 depends from amended claim 1 and claims 39-40 depend from amended claim 27. Neither Sheard et al. nor Doviak et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein a "network integration layer [which] provides both an option for foreign protocol integration for

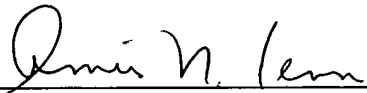
converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol”.

Moreover, applicants believe that the Doviak reference does not teach a network integration layer where “the protocol translation service comprises both an option for network layer integration and an option for data link layer integration.” (Emphasis added). In fact, the Doviak reference teaches away from the limitation. At col. 38, lines 61-64, the Doviak reference teaches “The main purpose of the Data-Link layer is to insulate the Networking layer from the details of the many link-level protocols used to transport data.” As taught by Doviak, if a protocol conversion is included in the data-link layer, a protocol conversion is unnecessary in the networking layer, which is contrary to the limitation as now claimed. Therefore, for at least these reasons, Applicants respectfully request that the rejection to claims 20 and 39-40 be withdrawn.

### **CONCLUSION**

Applicants submit that all of the pending claims are in condition for allowance and notice to this effect is respectfully requested. The Examiner is invited to call the undersigned if it would expedite the prosecution of this application.

Respectfully submitted,

  
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